

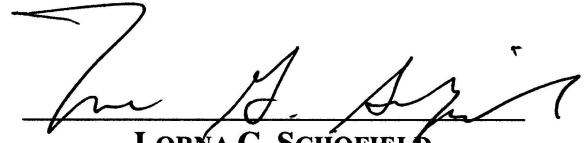
September 22, 2021

The parties shall complete each deposition by the deadline listed below. So Ordered.

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
Attn: Hon. Lorna G. Schofield, U.S.D.J.  
500 Pearl Street  
New York, NY 10007

Dated: September 23, 2021  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Re: *Edelman v. NYU Langone Health System, et al.*  
Case No. 1:21-cv-00502 (LGS) (GWG)

Dear Judge Schofield:

Counsel for the parties write jointly pursuant to the Court's Order (Doc. No. 53) to provide the following proposed deadlines for each outstanding deposition.

**Confirmed Depositions**

1. Kathleen Pacina – September 24, 2021
2. Andrew Rubin – September 27, 2021

**Deadlines for Depositions**

1. David Kaplan – October 13, 2021
2. Joseph Antonik – October 13, 2021
3. Andrew Porges – October 27, 2021
4. Kavini Mehta – October 29, 2021
5. Joshua Swirnow – November 15, 2021

Additionally, while the first day of Plaintiff's deposition occurred on September 20, 2021 from 10:34 AM to 6:30 PM, Defendants may seek additional time to continue Plaintiff's deposition pursuant to Rule 30(d)(1) of the Federal Rules of Civil Procedure. The parties have agreed to meet and confer on this issue prior to any motion practice.

Further, Plaintiff is in the process of preparing subpoenas to former NYU employees Joseph Taverni and Miriam Ruiz.

The parties thank this Court for its time and attention to this case.

Hon. Lorna G. Schofield  
Page 2 of 2

Dated: Lake Success, New York  
September 22, 2021

**MILMAN LABUDA LAW GROUP PLLC**

By: /s/ Emanuel Kataev  
Joseph M. Labuda  
Emanuel Kataev  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
(516) 328-8899  
joe@mlaborlaw.com  
emanuel@mlaborlaw.com  
*Attorneys for Plaintiff*

Dated: New York, New York  
September 22, 2021

**TARTER KRINSKY & DROGIN LLP**

By: /s/ Richard L. Steer  
Richard L. Steer  
Tara T. Carolan  
1350 Broadway, 11<sup>th</sup> Floor  
New York, NY 10018  
(212) 216-8000  
rsteer@tarterkrinsky.com  
tcarolan@tarterkrinsky.com  
*Attorneys for Defendants*